

1 CAMERON STOUT, CASB NO. 117373
cameron.stout@kyl.com
2 GARRETT R. WYNNE, CASB NO. 220665
garrett.wynne@kyl.com
3 KEESAL, YOUNG & LOGAN
A Professional Corporation
4 Suite 1500
Four Embarcadero Center
5 San Francisco, California 94111
Telephone: (415) 398-6000
6 Facsimile: (415) 981-0136

7 Attorneys for Defendant and Third Party Plaintiff
WEDBUSH MORGAN SECURITIES INC.
8

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11

12 ACORN CAPITAL GROUP, LLC.,) Case No. C 06 1674 JSW
13)
Plaintiff,)
14)
vs.) STIPULATION AND [PROPOSED]
15) ORDER FOR CONTINUING EXPERT
WEDBUSH MORGAN SECURITIES INC.) DISCOVERY DATES
16 and MAX SAFDIE,)
17)
Defendants.)
18)
19)
AND RELATED CROSS-ACTION)
20)

21 I. INTRODUCTION

22 On January 11, 2008, the parties submitted their most recent [Proposed] Order
23 for Continuing Certain Pretrial Dates. On January 14, 2008, the Court issued an Order
24 setting forth the following dates:

25 Trial Date:	September 8, 2008 at 8:30 a.m.
26 Pretrial Conference:	August 4, 2008 at 2:00 p.m.
27 Last Day to Hear Dispositive Motions:	May 9, 2008 at 9:00 a.m.
28 Last Day for Expert Discovery:	March 21, 2008

1 Last Day for Expert Disclosures: February 8, 2008

2 Close of Non-Expert Discovery: March 17, 2008

3 In its present form, the Court's January 14, 2008 Order calls for expert discovery
4 to be completed four days after the completion of fact discovery. However, the parties
5 have scheduled depositions of percipient witnesses for the weeks of March 4, 2008 and
6 March 11, 2008, and the testimony elicited during those depositions is likely to bear
7 upon the issues to be addressed by the parties' respective experts in their reports and
8 testimony. Accordingly, to allow sufficient time for the parties' experts to consider the
9 upcoming deposition testimony in formulating their opinions and testimony, the parties
10 respectfully request that the Court move the deadline to complete expert discovery to
11 April 11, 2008, with expert disclosures to be exchanged on or before March 24, 2008.¹
12 This additional time will not impact any of the Court's other deadlines, as the trial is not
13 set to commence until September 8, 2008.

14 Accordingly, the parties have entered into the following stipulation, and
15 respectfully request that the Court execute this Proposed Order based on that
16 stipulation.
17
18
19
20
21
22
23
24
25

26
27 ¹ With regard to the deadline for expert disclosures, we note that the date of February 8, 2008 that was
28 included in the Court's January 14, 2008 Order was actually intended by the parties to be April 10, 2008,
as reflected in the parties' stipulation. We apologize to the Court for any confusion caused by this
typographical error, which unfortunately was noted only after counsel received the Court's Order.


1 II. STIPULATION

2 The parties, by and through their attorneys of record herein, submit their
3 Stipulation and Proposed Order Continuing Certain Pretrial Dates as follows:
4

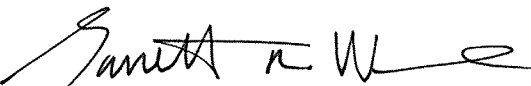
- 5 1. The deadline to complete expert discovery may be continued from 3/21/08 to
6 4/11/08 (with expert disclosures due by 3/24/08).

7 IT IS SO STIPULATED.

8
9 DATED: February 12, 2008


GEOFFREY POTTER
SUSAN JACQUEMOT
KRAMER LEVIN NAFTALIS & FRANKEL
LLP
Attorneys for Plaintiff
ACORN CAPITAL GROUP LLC

10
11
12
13
14 DATED: February 12, 2008



CAMERON STOUT
GARRETT R. WYNNE
KEESAL, YOUNG & LOGAN
Attorneys for Defendant and Third-Party
Plaintiff
WEDBUSH MORGAN SECURITIES INC.

15
16
17
18
19 DATED: February 12, 2008


MAX SAFDIE, *IN PROPER*

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

1. The deadline to complete expert discovery may be continued from 3/21/08 to 4/11/08 (with expert disclosures due by 3/24/08).


HONORABLE JEFFREY S. WHITE
UNITED STATES DISTRICT COURT JUDGE